



July 19, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

MEMO ENDORSED

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Memorandum of Law and Supporting Declaration in
Redacted Form and Exhibits to the Latter Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, we write to request permission to file Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Issuance of a Letter of Request (the "Memorandum of Law") and the Declaration of Laura M. King in Support of Plaintiffs' Motion (the "King Declaration") in redacted form and Exhibits 1 and 2 to the King Declaration under seal.

Much of the information contained in the Memorandum of Law concerns the Anonymous Trader and is therefore to be treated as "strictly AEO in the first instance." ECF No. 195 at 2. To prevent disclosure of any information usable to identify the Anonymous Trader, Plaintiffs intend to redact all references to the Trader's name and location, including his country of residence.

The King Declaration and the exhibits thereto also contain information concerning the Anonymous Trader. Exhibits 1 and 2 to the King Declaration contain the Anonymous Trader's name and address. Accordingly, Plaintiffs respectfully request leave to file the Memorandum of Law and King Declaration in redacted form and Exhibits 1 and 2 to the King Declaration under seal to comply with the Court's prior orders. *See* ECF Nos. 195, 215.

Hon. Katherine Polk Failla
July 19, 2023

Respectfully submitted,

/s/ Oscar Shine

Philippe Z. Selendy
Andrew R. Dunlap
Oscar Shine
Laura M. King
SELENDY GAY ELSBERG PLLC
1290 Sixth Avenue
New York, NY 10104
pselendy@selendygay.com
adunlap@selendygay.com
oshine@selendygay.com
lking@selendygay.com

/s/ Todd M. Schneider

Todd M. Schneider (*pro hac vice*)
Matthew S. Weiler (*pro hac vice*)
Mahzad K. Hite (*pro hac vice*)
SCHNEIDER WALLACE COTTRELL
KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, CA 94608
tschneider@schneiderwallace.com
mweiler@schneiderwallace.com
mhite@schneiderwallace.com

*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)

Application GRANTED.

The Clerk of Court is directed to terminate the pending motion
at docket number 407.

Dated: July 19, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE